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Attorneys for WARNER BROS.
ENTERTAINMENT INC. and TURNER
ENTERTAINMENT CO.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

WARNER BROS. ENTERTAINMENT
INC. and TURNER
ENTERTAINMENT CO.

Plaintiffs,

v.

ERIC LOUZIL, an individual, SINGA
ENTERTAINMENT, SINGA HOME
ENTERTAINMENT, ECHELON
STUDIOS, ECHELON
ENTERTAINMENT, and DOES 1
through 50, inclusive,

Defendants.

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

CV12-08955 DSF(Ex)
Case No.

1 Plaintiffs WARNER BROS. ENTERTAINMENT INC. and TURNER
2 ENTERTAINMENT CO. (collectively, "Plaintiffs") for their Complaint against
3 Defendants ERIC LOUZIL, an individual, SINGA ENTERTAINMENT, SINGA
4 HOME ENTERTAINMENT, ECHELON STUDIOS, ECHELON
5 ENTERTAINMENT (collectively, "Defendants"), and DOES 1 through 50,
6 inclusive, allege as follows:

7 **NATURE OF THE CASE**

8 1. Piracy costs the major movie studios billions of dollars each year,
9 resulting in the loss of tens of thousands of jobs and hundreds of millions of dollars
10 in annual tax revenues. Pirates such as Defendants sell low-cost, low-quality copies
11 of copyrighted films and avoid legal consequence by disingenuously shutting down
12 infringing websites in response to demands by studios, only to reappear under
13 slightly different names.

14 2. Through their websites, including singahe.com, echelonstudios.us,
15 echelonflix.com and echelonclassicmovies.com, Defendants have engaged in blatant
16 piracy, selling unlicensed copies of classic films such as Stanley Kubrick's
17 groundbreaking masterpiece *A Clockwork Orange*, the classic 1940s detective film
18 *The Thin Man*, the 1940s romantic comedy *The Philadelphia Story* and the original
19 "talkie," *The Jazz Singer*. Even after Plaintiffs demanded Defendants cease and
20 desist their infringing activities, Defendants continued to promote and sell Plaintiffs'
21 copyrighted works. Indeed, Plaintiffs are aware of at least 34 feature films (the
22 "Features") that Defendants are currently selling, or have recently sold, on one or
23 more of their websites. A complete list of these Features is attached to this
24 Complaint as Exhibit "A."

25 3. Unless pirates like Defendants are held accountable for their infringing
26 activities, copyright holders, including Plaintiffs, will continue to suffer substantial
27 losses. Plaintiffs therefore bring this lawsuit to prevent Defendants from continuing
28 to profit from their unlawful conduct.

PARTIES

4. Plaintiff Warner Bros. Entertainment Inc. (“Warner Bros.”) is a Delaware corporation with its principal place of business in Burbank, California. Warner Bros. has, for decades, been one of the largest and most well-known distributors of live-action feature films in the world, including *A Clockwork Orange* and the Oscar-winning Elia Kazan classic *Baby Doll*.

5. Plaintiff Turner Entertainment Co. (“Turner”) is a Delaware corporation, with its principal place of business in Burbank, California, and is a wholly-owned subsidiary of Warner Bros. Turner owns the copyrights to feature films including *The Philadelphia Story*, *The Jazz Singer*, *The Thin Man*, *The Shop Around the Corner* and the original *Tarzan* films featuring Johnny Weismuller.

6. Plaintiffs are informed and believe, and on that basis allege, that Defendant Eric Louzil (“Louzil”) is an individual residing in Encino, California.

7. Plaintiffs are informed and believe, and on that basis allege, that Defendant Louzil does business at various times under the names Singa Entertainment, Singa Home Entertainment, Echelon Studios and Echelon Entertainment (collectively, “Echelon”). Plaintiffs are informed and believe, and on that basis allege, that Echelon Studios is a Delaware Corporation, with principal place of business in Encino, California. Plaintiffs are informed and believe that none of the other Echelon or Singa entities is a duly-formed corporation, LLC or other entity.

8. Plaintiffs do not know the true names or capacities of the persons or entities sued herein as DOES 1 through 50, inclusive, and therefore sue these Defendants by such fictitious names. Plaintiffs are informed and believe, and on that basis allege, that each of the Doe Defendants was in some manner legally responsible for the damages alleged below. Plaintiffs will amend this Complaint to set forth the true names and capacities of these Defendants when they have been ascertained, along with appropriate charging allegations.

1 9. Plaintiffs allege on information and belief that each of the Defendants
 2 acted jointly and in concert, and with the knowledge of the actions of each of the
 3 other Defendants, and ratified and/or authorized all of the actions complained of
 4 herein, and acted as the agent and co-conspirator of each of the other Defendants
 5 with respect to the allegations alleged herein.

6 **JURISDICTION AND VENUE**

7 10. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and
 8 1338(a). Venue in this district is proper under 28 U.S.C. §§ 1391(b), (c) and
 9 1400(a).

10 **DEFENDANTS' INFRINGING CONDUCT**

11 11. Without authorization from Plaintiffs, and in direct violation of
 12 copyright laws, Defendants have been, and currently are, reproducing, distributing,
 13 promoting, selling and displaying at least 34 Features, including but not limited to *A*
 14 *Clockwork Orange*, *The Thin Man*, *The Shop Around the Corner*, *The Philadelphia*
 15 *Story* and *The Jazz Singer*, in violation of Plaintiffs' exclusive rights under 17
 16 U.S.C. § 106, in the United States and abroad. *See* Exh. "A."

17 12. Plaintiffs have demanded that Defendants cease and desist from their
 18 infringement of Plaintiffs' copyrights. Notwithstanding this demand, Defendants
 19 continue to reproduce, distribute, promote, sell and display the Features, through the
 20 sale of DVDs and, through websites such as www.echelonflix.com, allowing users
 21 to stream the Features. A list of those Features available for streaming on
 22 www.echelonflix.com as of the date of filing this Complaint is attached to this
 23 Complaint as Exhibit "B."

24 13. Defendants have also created unauthorized derivative works of the
 25 Features, in violation of Plaintiffs' exclusive right to prepare such works. *See* 17
 26 U.S.C. § 106(2). For example, the version of *The Philadelphia Story* available on
 27 www.echelonflix.com has been heavily edited and has a run time of one hour,
 28 fifteen minutes, more than thirty minutes less than the film's actual length.

14. Defendants are constantly changing which of Plaintiffs' films they make available for unauthorized sale or exhibition, as well as the names and URLs of the websites on which Defendants sell or exhibit these unauthorized works. Plaintiffs therefore reserve their right to amend their Complaint as they learn of additional infringing acts.

FIRST CLAIM FOR RELIEF

(Copyright Infringement — 17 U.S.C. §§ 501 *et seq.* against all Defendants)

15. Plaintiffs incorporate by reference each and every allegation contained in paragraphs 1 through 14 above.

16. Plaintiffs are the owners of copyright interests in each of the Features listed on Exhibit "A" to this Complaint.

17. By its conduct as alleged above and on Exhibit "B", Defendants have willfully violated, and continue to violate Plaintiffs' exclusive right to reproduce, distribute copies of, display and publicly perform these copyrighted works.

18. As a direct result of Defendants' wrongful conduct, Plaintiffs have suffered great and irreparable injury and will continue to suffer injury unless Defendants are enjoined. Plaintiffs have no adequate and complete remedy at law.

19. As a further result of Defendants' wrongful conduct, Plaintiffs have been damaged in an amount not presently ascertainable. Plaintiffs are entitled to damages and Defendants' profits, according to proof, or, if Plaintiffs so elect, statutory copyright damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request judgment in its favor and against Defendants as follows:

1. That during the pendency of this action and permanently thereafter, Defendants and their officers, directors, employees, agents, attorneys, servants, and all persons, firms, corporations and associations in active concert or participation with them, including but not limited to Eric Louzil, be enjoined from in any way

1 infringing upon Plaintiffs' copyrighted Features, or any of Plaintiffs' other
2 copyrighted works, including the use of any matter or material substantially similar
3 to Plaintiffs' copyrighted works.

4 2. That this Court enjoin Defendants and their officers, directors,
5 employees, agents, attorneys, servants, and all persons, firms, corporations and
6 associations in active concert or participation with them, including but not limited to
7 Eric Louzil, from failing to produce and deliver to the United States Marshal or his
8 or her deputies — and that this Court issue an order providing that the United States
9 Marshal or his or her deputies, forthwith seize and impound, and allow Plaintiffs'
10 counsel to inspect and copy — any and all material in Defendants' possession or
11 control that contains copies of any of Plaintiffs' copyrighted Features, any other of
12 Plaintiffs' copyrighted works, or which contains any other matter substantially
13 similar to Plaintiffs' copyrighted works, and all masters, prints, tapes, negatives,
14 plates, molds, matrices and other means of making the foregoing which might, if
15 used, constitute infringement of Plaintiffs' copyrights.

16 3. That Defendants be enjoined from failing to take all steps within their
17 power to recall and collect from retailers, distributors, sellers, and any other persons
18 or entities all copies of the materials described in paragraph 2, above, and deliver
19 such materials to the United States Marshal or his or her deputies pursuant to the
20 provisions of paragraph 2, above.

21 4. That Defendants account to Plaintiffs for all gains, profits, and
22 advantages derived by them, directly or indirectly, as a result of their conduct as
23 alleged in this Complaint.

24 5. That Defendants be ordered to file with the Court and to serve upon
25 Plaintiffs within 30 days after service of the Court's Orders as prayed for herein, a
26 report in writing and under oath setting forth in detail the manner and form in which
27 it has complied with the Court's Orders.

28

1 6. That Defendants pay Plaintiffs the actual damages they have sustained
2 as a result of Defendants' copyright infringement, and all gains, profits, and
3 advantages derived by Defendants from such infringement; or, in the alternative, if
4 plaintiffs so elect, that Defendants pay to Plaintiffs statutory damages.

5 7. For Plaintiffs' costs of suit.

6 8. For Plaintiffs' reasonable attorneys' fees.

7 9. For such other, further or different relief as this Court deems just and
8 proper.

9 DATED: October 17, 2012

Respectfully submitted,

11 CALDWELL LESLIE & PROCTOR, PC
12 CHRISTOPHER G. CALDWELL
13 LINDA M. BURROW
14 KELLY L. PERIGOE

15 By 

LINDA M. BURROW

16 Attorneys for WARNER BROS.
17 ENTERTAINMENT INC. and TURNER
18 ENTERTAINMENT CO.
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EXHIBIT A

Exhibit "A"**List of Features**

Title	Registration	Renewal	Title Holder
Adam's Rib	L 2615	R 646596	Turner Entertainment Co.
After The Thin Man	L 6821	R 328940	Turner Entertainment Co.
Annie Oakley	LP 5984	R 305968	Turner Entertainment Co.
Babes On Broadway	L Pub 11215	R 450436	Turner Entertainment Co.
Baby Doll	LP 9720	RE 198-049	Warner Bros. Entertainment Inc.
Ben-Hur: A Tale of the Christ	L 24477	R 156197	Turner Entertainment Co.
Black Scorpion, The	LP 12503	RE 253-378	Warner Bros. Entertainment Inc.
Blackbeard The Pirate	LP 2178	RE 73-599	Turner Entertainment Co.
Captain Blood	LP 6027	R 311594	Turner Entertainment Co.
Catered Affair, The	LP 6508	RE 189-377	Turner Entertainment Co.
Clockwork Orange, A	LP 41304	RE 610-505	Warner Bros. Entertainment Inc.
Fearless Vampire Killers	LP 35102	RE 621-445	Turner Entertainment Co.
Four Horsemen of the Apocalypse, The	L 16308	R 42606	Turner Entertainment Co.
Good News (1930)	L 1506	R 204559	Turner Entertainment Co.
Good News (1947)	L 1397	R 592965	Turner Entertainment Co.
I Love You Again	L1 9869	R 415500	Turner Entertainment Co.
Ivanhoe	LP-1798	RE 43-700	Turner Entertainment Co.

Title	Registration	Renewal	Title Holder
Jazz Singer, The	LP 24505	R 146197	Turner Entertainment Co.
Libeled Lady	L 6652	R 323474	Turner Entertainment Co.
Mark of the Vampire	L 5490	R 293846	Turner Entertainment Co.
Mogambo	LP-3755	RE 77-506	Turner Entertainment Co.
None But The Lonely Heart	LP 13003	R 522301	Turner Entertainment Co.
Petrified Forest	LP 6116	R 318845	Turner Entertainment Co.
Philadelphia Story, The	LP 10102	R 423310	Turner Entertainment Co.
Satan Met A Lady	LP 6484	R 320089	Turner Entertainment Co.
Shop Around the Corner, The	L1 9552	R 401323	Turner Entertainment Co.
Tarzan and His Mate	L 4647	R 274614	Turner Entertainment Co.
Tarzan Escapes	L 6710	R 325061	Turner Entertainment Co.
Tarzan's New York Adventure	L 2061	R 457710	Turner Entertainment Co.
Tarzan's Secret Treasure	L pub 10872	R 448904	Turner Entertainment Co.
Them!	LP 4918	RE 131-473	Warner Bros. Entertainment Inc.
Thin Man, The	L 4745	R 277211	Turner Entertainment Co.
Valley of Gwangi, The	LP 36136	RE 765-230	Warner Bros. Entertainment Inc.
Westworld	LP 42879	RE 848-701	Turner Entertainment Co.

EXHIBIT B

Exhibit "B"

List of Features Available for Streaming on www.echelonflix.com

Adam's Rib
After The Thin Man
Annie Oakley
Babes On Broadway
Ben-Hur: A Tale of the Christ
Black Scorpion, The
Captain Blood
Catered Affair, The
Four Horsemen of the Apocalypse, The
I Love You Again
Ivanhoe
Jazz Singer, The
Mark of the Vampire
Mogambo
Petrified Forest
Philadelphia Story, The
Satan Met A Lady
Shop Around the Corner, The
Tarzan and His Mate
Tarzan Escapes
Tarzan's New York Adventure
Tarzan's Secret Treasure
Thin Man, The
Valley of Gwangi, The



**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> WARNER BROS. ENTERTAINMENT INC. and TURNER ENTERTAINMENT CO.	DEFENDANTS ERIC LOUZIL, an individual, SINGA ENTERTAINMENT, SINGA HOME ENTERTAINMENT, ECHELON STUDIOS, ECHELON ENTERTAINMENT, and DOES 1 through 50, inclusive
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Caldwell Leslie & Proctor, PC (213) 629-9040 725 South Figueroa Street, 31st Floor Los Angeles, CA 900171	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:35%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:45%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)
☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify):
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: **JURY DEMAND:** ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint)
CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No
 MONEY DEMANDED IN COMPLAINT: \$ In Excess of \$75,000

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 17 U.S.C. Sections 501 et seq.; Copyright infringement

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV12-08955

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.

☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Warner Bros. Entertainment Inc. - Los Angeles Turner Entertainment Co. - Los Angeles	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.

☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Eric Louzil; Singa Entertainment; Singa Home Entertainment; Echelon Studios; Echelon Entertainment - Los Angeles	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date October 17, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

ORIGINAL

Name & Address: Caldwell Leslie & Proctor, PC
 Christopher G. Caldwell (SBN 106790)
 Linda M. Burrow (SBN 194668)
 Kelly L. Perigoe (SBN 268872)
 725 South Figueroa Street, 31st Floor
 Los Angeles, CA 90017

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

WARNER BROS. ENTERTAINMENT INC. and
 TURNER ENTERTAINMENT CO.

PLAINTIFF(S)

ERIC LOUZIL, an individual, SINGA
 ENTERTAINMENT, SINGA HOME ENTERTAINMENT,
 ECHELON STUDIOS, ECHELON ENTERTAINMENT,
 and DOES 1 through 50, inclusive,

DEFENDANT(S).

CASE NUMBER

CV12-08955

DSF (tx)

SUMMONS

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Caldwell Leslie & Proctor, PC, whose address is 725 South Figueroa Street, 31st Floor, Los Angeles, CA 90017. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Dated: _____

Clerk, U.S. District Court

By: _____

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].